

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No. 21-21690-CMB  
: Chapter 13  
John F. Hobdy, Jr. : Doc No. \_\_\_\_  
Debtor : Related to Claim No. 9  
: \_\_\_\_\_  
Flagstar Bank FSB :  
Movant :  
: \_\_\_\_\_  
v. :  
John F. Hobdy, Jr. :  
Respondents : \_\_\_\_\_

**DECLARATION OF DEBTOR'S COUNSEL THAT THE CHAPTER 13  
PLAN (AUGUST 31, 2022) REMAINS ADEQUATELY FUNDED**

Re: John F. Hobdy, Jr. Account #XXXX7134

I, Matthew M. Brennan, Esq., counsel for the debtor, John F. Hobdy, Jr., have reviewed the Notice filed with the Court on August 22, 2023, which indicates the current monthly mortgage payment will change to \$1,499.02, effective October 1, 2023. A true and correct copy of the Notice of Mortgage Payment Change is annexed hereto as Exhibit "A".

I have reviewed the existing Plan, recalculated the Plan payment, and have found the existing payment is sufficient to fund the Plan at the new monthly mortgage payment. No amendment to the Plan is needed.

All future notices of post-petition monthly payment changes must be served on the debtor, debtor's counsel, and the Trustee. Service of such notice will not be construed as a violation of the Automatic Stay.

EXECUTED ON: August 22, 2023

By: /s/Matthew M. Brennan, Esq.  
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